

FORM TO BE USED BY PRISONERS IN FILING A COMPLAINT UNDER THE CIVIL RIGHTS ACT, 42 U.S.C. § 1983  
**IN THE UNITED STATES DISTRICT COURT  
 FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**COMPLAINT**

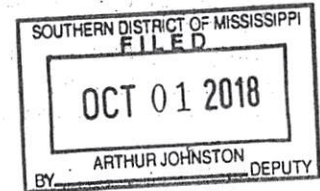
Pinkston 148934  
 (Last Name) (Identification Number)

Chaz D.  
 (First Name) (Middle Name)

Wilkinson County Correctional Facility  
 (Institution)

2999 HWY 61 North, Woodville, MS 39669  
 (Address)

(Enter above the full name of the plaintiff, prisoner, and address  
 plaintiff in this action)



V.

CIVIL ACTION NUMBER 5:18-cv-103-DCB-MTP  
 (to be completed by the Court)

Pelicia Hall, Jerry Williams, Tony Compton

American Correctional Association, Manag

ement and Training Corporation, Trinity

D. Banks, Larry Lee, Robin Williams,  
 (Enter above the full name of the defendant or defendants in this action)

**OTHER LAWSUITS FILED BY PLAINTIFF****NOTICE AND WARNING:**

The plaintiff must fully complete the following questions. Failure to do so may result in your case being dismissed.

- A. Have you ever filed any other lawsuits in a court of the United States? Yes ☒ No ☐  
 (to be completed by the Court)
- B. If your answer to A is yes, complete the following information for each and every civil action and appeal filed by you. (If there is more than one action, complete the following information for the additional actions on the reverse side of this page or additional sheets of paper.)

1. Parties to the action: MDOC, Pelicia Hall, Steven Anderson, Robert  
Benford, Keba Taylor, Centurion of Mississippi, LLC,  
Dr. H. Kuiper, and Nurse L. Barron  
 (Enter above the full name of the defendant or defendants in this action)

2. Court (if federal court, name the district; if state court, name the county): Northern District  
of Mississippi, Greenville Division  
 (The plaintiff must fully complete this question.)

3. Docket Number: 4:17-CV-39-DMB-DAS

4. Name of judge to whom case was assigned: David A. Sanders, Debra M. Brown

5. Disposition (for example: was the case dismissed? If so, what grounds? Was it appealed? Is it still pending?): It is still pending.

Disposition (if any)  
pending?

What grounds? Was it apparent to the court?

## PARTIES

(In item I below, place your name and prisoner number in the first blank and place your present address in the second blank. Do the same for additional plaintiff, if any).

I. Name of plaintiff: Chaz Pinkston Prisoner Number: 148934

Address: Wilkinson County Correctional Facility

Unit: H.J.K H-pod Cell #108

P.O. Box 1889, 2999 U.S. HWY 61 North, Woodville, MS 39669

(In item II below, place the full name of the defendant in the first blank, his official position in the second blank, and his place of employment in the third blank. Use the space below item II for the names, positions, and places of employment of any additional defendants.)

II. Defendant: Pelicia Hall represented as Commissioner of Mississippi Department of Corrections at 633 North State  
for additional plaintiff, if any

I. Name of plaintiff: Street, Jackson, MS 39202

The plaintiff is responsible for providing the court the name and address of each plaintiff(s) as well as the name(s) and address(es) of each defendant(s). Therefore, the plaintiff is required to complete the portion below:

## PLAINTIFF:

(In item II below, place the full name of the

NAME: Chaz Pinkston ADDRESS: P.O. Box 1889, 2999 U.S. HWY 61 North, Woodville, MS 39669

total position in the second blank, and his place of employment in the third blank. Use the space below item II for the names, positions, and places of employment of any additional

II. Defendant: Gerry Williams

## DEFENDANT(S):

NAME:

Gerry Williams

ADDRESS:

633 North State St., Jackson, MS 39202

Tony Compton

633 North State St., Jackson, MS 39202

of each defendant(s). Therefore, the plaintiff

Larry Lee

2999 U.S. HWY 61 North, Woodville, MS 39669

PLAINTIFF: Management & Training Corporation

500 North Market Place Dr. #100, Centerville, Utah 84104

Robyn Williams

500 North Market Place Dr. #100, Centerville, Utah 84104

Jody Bradley

2999 U.S. HWY 61 North, Woodville, MS 39669

## DEFENDANT(S):

NAME:

Defendant(s):

Name:	Address:
Gabriel Walker	2999 U.S. HWY 61 North, Woodville, MS 39669
Case Worker Ms. January	2999 U.S. HWY 61 North, Woodville, MS 39669
Tonya Toomey	2999 U.S. HWY 61 North, Woodville, MS 39669
Terry Daniels	2999 U.S. HWY 61 North, Woodville, MS 39669
Justin Green	2999 U.S. HWY 61 North, Woodville, MS 39669
Lt. Gaston	2999 U.S. HWY 61 North, Woodville, MS 39669
Lt. Guchoer Gerbo	2999 U.S. HWY 61 North, Woodville, MS 39669
Lt. Delanda Miles	2999 U.S. HWY 61 North, Woodville, MS 39669
Sgt. Micheal Johnson	2999 U.S. HWY 61 North, Woodville, MS 39669
Sgt. Jacob Jones	2999 U.S. HWY 61 North, Woodville, MS 39669
C/O C. Hughey	2999 U.S. HWY 61 North, Woodville, MS 39669
C/O B. Chester	2999 U.S. HWY 61 North, Woodville, MS 39669
C/O King	2999 U.S. HWY 61 North, Woodville, MS 39669
Registered Nurse Robertson	2999 U.S. HWY 61 North, Woodville, MS 39669
Unit Manager Brown	2999 U.S. HWY 61 North, Woodville, MS 39669
Trinity - Food Service Contractor for W.C.C.F.	
Roger Davis - M.D.O.C. Food Services Director	633 North State Street, Jackson, MS 39202
Nutritional Supervisor, Ms. Dunmore	2999 U.S. HWY 61 North, Woodville, MS 39669
A.C.A. James A. Gendles	206 North Washington St, #200, Alexandria, VA 22314
D. Banks	633 North State Street, Jackson, MS 39202
Richard Pennington	633 North State Street, Jackson, MS 39202
Mississippi Department Of Health	570 East Woodrow Wilson Drive, Jackson, MS 39216
Robert Marquardt - Founder of M.T.C.	500 North Market Place Dr. #100, Centerville, Utah 84204

## GENERAL INFORMATION

A. At the time of the incident complained of in this complaint, were you incarcerated because you had been convicted of a crime?

Yes (X) No ( )

B. Are you presently incarcerated for a parole or probation violation?

Yes ( ) No (X)

C. At the time of the incident complained of in this complaint, were you an inmate of the Mississippi Department of Corrections (MDOC)?

Yes (X) No ( )

D. Are you currently an inmate of the Mississippi Department of Corrections (MDOC)?

A. Yes (X) No ( )

incarcerated because you had been convicted of a crime?

E. Have you completed the Administrative Remedy Program regarding the claims presented in this complaint?

B. Yes (X) No ( ) If so, state the results of the procedure: I have fully exhausted through strenuous efforts "all" available administrative grievance procedures.

F. If you are not an inmate of the Mississippi Department of Corrections, answer the following questions: (MDOC)?

1. Did you present the facts relating to your complaint to the administrative or grievance procedure in your institution?

Yes ( ) No ( )

Yes ( ) No ( )

D. Are you currently an inmate of the

as (MDOC)?

2. State how your claims were presented (written request, verbal request, request for forms): N/A

Yes ( ) No ( )

documentary evidence and/or an interview of a subject

E. Have you completed the Administrative

claims presented in this complaint?

Yes ( ) No ( ) If so, state

3. State the date your claims were presented: N/A

4. State the result of the procedure: N/A

F. If you are not an inmate of the

answer the following questions: (MDOC)?

1. Did you present the fact

administrative or grievance procedure in your institution?

Yes ( ) No ( )

Yes ( ) No ( )

2. State how your claims were

request, request for forms):

Yes ( ) No ( )

3. State the date your claim

Yes ( ) No ( )

4. State the result of the procedure:

Yes ( ) No ( )

5. State the date your claim

Yes ( ) No ( )

6. State the result of the procedure:

Yes ( ) No ( )

7. State the date your claim

Yes ( ) No ( )

8. State the result of the procedure:

Yes ( ) No ( )



## STATEMENT OF CLAIM

- III. State here as briefly as possible the facts of your case. Describe how each defendant is involved. Also, include the names of other persons involved, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of different claims, number and set forth each claim in a separate paragraph. (Use as much space as you need; attach extra sheet if necessary.)

(1) Pelicia Hall, Jerry Williams, Tony Compton, Larry Lee, Management Training and Corporation ('M.T.C.'). Robyn Williams, Jody Bradley, Gabriel Walker, Tonya Toomey, Terry Daniels individually and collectively keep forcibly subjecting me to "collective/group" punishment and "corporal" punishment starting from January 29<sup>th</sup>, 2018 and still counting even past the present date because it is still going on right now. I am in a "long-term segregation" "maximum security" and am constantly being punished for every incident or issue or situation that occurs in general population plus with other prisoners in their single man cells in "maximum security". I am already in 24-hour lockdown with no end in sight. — Please See Additional Attached Page(s)/Paper(s) —

## RELIEF

- IV. State what relief you seek from the court. Make no legal arguments. Cite no cases or statutes.
- An 'open to the public' jury trial. Award the costs of this suit, and reasonable attorneys' fees and litigation expenses, punitive and compensatory damages as well as mental and emotional damages for the amount of \$2.5 million dollars. To be paid in full! Also, for "all" the defendants to be held liable and responsible in their individual capacities and official capacities. For the Court to retain jurisdiction of this case until Defendants have fully complied. Pursue all Criminal Charges.
- Signed this 18<sup>th</sup> day of September, 20 18

- IV. State what relief you seek from the court.

Chaz Pinkston #148934, Wilkinson County Correctional Facility, 2999 U.S. HWY 61 N., Woodville, MS 39669  
Signature of plaintiff, prisoner number and address of plaintiff

I declare under penalty of perjury that the foregoing is true and correct.

09-18-18  
(Date)

Chaz Pinkston  
Signature of plaintiff

## Addendum To Page ④ Of The Statement Of Claim

However, now all of my civil, legal, and constitutional rights, privileges, and guaranties are being taken/heavily infringed. I am being denied religious services with the Jehovah Witnesses (who have visited at least twice to see me yet were denied), recreation which is why I stated earlier in this complaint that an on 24-hour lockdown-seven (7) days a week, commissary items in order to purchase hygienic items and food and other miscellaneous items like stamps and envelopes which are gravely needed, earned visitation privileges, legal and family phone calls, all grooming upkeep dealing with my hair on my head and face, adequate and appropriate caloric servings (per day) which according to MDOC Meal Service Policy #23-05-01 page 2 lines 42-43; 'The dietician will ensure that the menu meets all requirements of the National Academy of Science allowances and a minimum average of 2900 calories per day.' Yet, instead am being served less than 1,000 Kcal (per day). So am being starved as a torture tactic along with general population and/or another prisoner(s) in "maximum security" for their actions irregardless of me being in a single man cell and having nothing to do with anyone else problems. The unjust application of general population lockdowns for months as well as "collective/group" punishment and corporal punishment towards "maximum security" units is "cruel and unusual punishment" under the Eighth Amendment, violation of the 'due process of law' under the Fourteenth Amendment, and denial of 'Freedom of speech' under the First Amendment. I'm written R.V.R.'s and they denied by staff to attend the hearing's without it affecting any other prisoners while these administrators keep ensuring that all other prisoner's actions keep affecting and punishing me. These administrators preach adamantly, 'We Are Our Brother(s)/Fellow Prisoner(s) Keepers,' 'The Good Must Suffer With The Bad,' 'We Are All Responsible For One Another.' This mind set and behavior is advocated from the highest level of MDOC and M.T.C. administration permeating every part of this department with the direct result of this facility being deemed "The Killing Field and Death Valley" on the internet openly for many years. They promote this violence than use it as an excuse to lockdown the entire prison for months without end, specifically "maximum security" long-term because they say "we" are all gang-affiliated, despite the fact that the ones involved in all the violence aren't even in "maximum security" plus they know they are disobeying the Federal and State Constitution's, laws, and MDOC "own" policies in totality. This is all torture tactics which M.D.O.C. and M.T.C. both have history of in the past and very recent present. These people are sinister and blatant with their 'wanton infliction of pain' because their informal policies and in-house rules have made them untouchable here for so long. I am a third-party beneficiary of the contract between M.D.O.C. and M.T.C. which directly outlines that M.T.C. obey M.D.O.C. policies as well as federal policies and laws. Being starved for 9 months-counting is the worst.

(2) On May 5<sup>th</sup> 2018 Sgt. M. Johnson beat my hand with the tray flap, twisted my hands twice - the first time while snatching my cup from my hand because of my complaining about him spitting in my cup -, and denied me medical attention after bruising my hand in parties

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Statement Of Claim

ular my thumb. He then began promising to have me assaulted by other prisoners then stated that he was going to set me up by spraying me then calling for back up so they would come help him bust me up." He went on the other two pod's plus around this pod trying to find out if I was affiliated. Upon finding out that I was not, he then proceeded to put in request for a favor for favors with certain prisoners in regards to his quest to harm me and have other prisoners harm me. On May 10<sup>th</sup>, 2018, on or about 2:45 til 2:50 p.m., Sgt. Micheal Johnson again assaulted me by smashing my left hand in the tray slot. This is after he had ordered all three subordinate floor officers (B. Chester, C/O King, C. Hughey) to not serve me any food nor water neither to open the tray slot 'until he got ready to allow me too eat. Lunch trays came at 10:00 a.m. yet mine was set on the phone wall and left there. On or about the above dated time, Sgt. Micheal Johnson, he came to the cell door grinning and began mocking me about my lunch tray sitting on the wall, he even mockingly pretended to serve me my tray while the tray slot was closed. Well, afterwards he unlocked the tray slot (as if to give me my lunch tray) though once I began pushing up the tray flap, he, Sgt. Micheal Johnson, abruptly smashed it back down on to my hand than put his weight on it. It took some tug(s) plus with my other hand pushing the tray flap, I was finally able to jerk my hand out. He again denied me medical attention nor did I eat lunch that day. My hand and fingers were in pain for a few days and I had some skin that had peeled off and had caused my fingers to bleed. On May 15<sup>th</sup>, 2018, I was assaulted for the third time within two (2) weeks by Sgt. Micheal Johnson, directly in the presence of Major-Terry Daniels, Deputy Warden Of Programs-Tonya Toomey, Lt. Gaston, Investigator Turner, Captain Scott, Sgt. Bailey, B. Chester, C/O King, and multiple other staff. Between 2:00 p.m. to 3:50 p.m. on or about the above date I was assaulted by Sgt. Micheal Johnson, C.E.R.T. officer King, and Lt. Gaston, while I was in full restraints (handcuffs with the black box covering them: waist chains: leg irons) with a three (3) guard-escort of which, B. Chester, had the Use Of Force camera present. In route to the I.L.A.P. office I told officer King and Sgt. M. Johnson, that the leg iron restraint on my left leg was too tight and asked for it to be loosened. I was ignored. While in the I.L.A.P. office I lost all feeling in my left leg and asked, B. Chester, would she please loosen up the left leg iron because I couldn't feel my foot. She said that she didn't have the restraint Key which she then asked Sgt. M. Johnson for the Key. He refused to give her the Key to loosen it up but instead kept forcing his finger's down into the restraint which caused my leg to start hurting. When I told him to stop because it was hurting my leg he then raised up and began pulling my arm towards the door. I told him I couldn't feel my foot plus my leg was hurting now. Sgt. M. Johnson, pulled me into the hallway anyway and I only made it about four feet before the pain became unbearable in my left leg plus the pain from my foot being numb. Lt. Gaston and Investigator Turner appeared and I explained and asked if one of them would just untighten the left leg iron because it was so tight that it had cut-off the circulation to my foot and was now hurting my left leg after, Sgt. M. Johnson, had started



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jamming his fingers down in it. Well, Lt. Gaston began doing the exact same thing as the Investigator told me that he couldn't override security personnel. When I told Lt. Gaston to stop because he was causing me more pain he and Sgt. M. Johnson grabbed both of my arms of which I told them I couldn't walk because I couldn't feel my leg. Lt. Gaston looked at Sgt. M. Johnson and said; 'It's your call' than Sgt. M. Johnson replied; 'I'm not loosening up nothing, Ain't nothing wrong with him, Let's Go'. They both pulled my arms and I fell forwards so then Lt. Gaston grabbed the middle of the leg iron chains and Sgt. M. Johnson yanked me up by the black box and handcuff restraints with my full weight hanging down and the leg iron's, black box, handcuff's, and waist chains biting deep into my legs and wrists. I was carried about 50 steps to gate one C now with multiple officer's, administrator's, caseworkers, and orderlies all standing around watching. Captain Scott ordered that they put me down than she asked me what was going on but as I was telling her that I couldn't feel my left foot and my legs and wrist were then in excruciating pain the Major - Terry Daniels, Sgt. M. Johnson, Lt. Gaston, and Deputy Warden - Tonya Toomey cut me off and told staff to get me up. C/O King, Sgt. M. Johnson, and Lt. Gaston than yanked me up and were pushing me pulling me and force dragging me all the way down the hall without concern about my roars or roaring in pain. We made it on the zone and Sgt. M. Johnson and officer King rammed my body up against the wall than Sgt. M. Johnson knocked on the wall with my face two or three times. When I started saying so to the Major - Terry Daniels he said, "Keep talking and resisting and we're going to put you on the floor instead." Major - Terry Daniels began directing Sgt. M. Johnson and officer King to put me in the cell once they saw the tangerine knot protruding out of my head. I didn't see it but I felt warm blood trickling within my forehead but at that time I thought it was trickling on the outside of my face. I began demanding medical attention so the Major had me taken to an empty room in the hallway and had a nurse brought down too me instead of us going to medical. Ironically, he had the leg irons loosened up on both of my legs and hands and the women staffed gasped at my swollen wrist. Nurse Robertson came and wrote down the tangerine knot protruding out of my face ("which Captain Scott also took a photo of with a Use Of Force camera while I was with the nurse") but she adamantly refused to not examine my wrist, arms, legs, or ankles neither note the extreme pain I told her about in those areas also. She didn't even give me an ice-pack or anything period to place over the tangerine knot neither attempt to give me any medical care. She was basically done with me in 30 seconds max and the other minute and a half 1 1/2 she spent giving me excuses of why she wouldn't examine my wrist and legs and ankles. On this day my hands were injured, my wrist were injured, my ankles, my legs, my forehead, my right eyebrow, and my right eye. My wrist were both swollen with thick red lines, cuts and bruises and the circulation in my left hand was very weak as well as in my right hand. My hands, wrist, and legs were in constant, throbbing pain for three weeks after this assault. My left leg had a knot in it from the leg irons.



# Statement Of Claim

digging in deep deep from the defendants holding me upside down and carrying specifically by the restraints. I was degraded, disrespected, rebuked, and assaulted during this entire situation. My forehead, eyebrow, and eye were swollen and changing colors within hours which had my right eye swollen shut before 10:00p.m. that same night. For the next two and a half weeks afterwards the hemorrhaging and infection from my forehead and right eyebrow fully set in. My eyelid was constantly changing colors, oozing puss, and my eye was closed shut and swollen like the size of an "orange" with no indication of going down while my eyebrow was the size of a tangerine. My eye was in the above state for two and a half weeks and my eyebrow was swollen and didn't go down all the way until early in September 2018. I was denied/refused medical for two and a half weeks after this incident by security and the administration despite my steadily filing sick calls as well as multiple other nurses when making their rounds repeatedly noting my eyebrow, eye, forehead, wrists, ankles, and legs conditions. By the time I did make it to see the doctor (2 1/2 weeks later) my eye was still swollen though slightly open and still purple black with puss still leaking from it. I wrote two letters/reports to M.T.C. Vice President - Robyn Williams, Commissioner - Pelicia Hall, Audrey McAfee the Deputy Administrator, Private Prisons Contract Director - Tony Compton, MDOC Federal Compliance Officer, and Administrative Remedy Program Director - Richard Pennington, yet these types of things are on-going issues and very serious problems which is why I filed this grievance in a timely manner and in accordance with procedural guidelines. This is the only way for justice to be rendered via the Court(s) plus stop the abuse by excessive force. This administration here along with "all" aforementioned staff mentioned in this complaint and especially the above high-ranking administrator's are continually proving to be "deliberately indifferent" infringing upon the Eighth Amendment. I stated as relief sought to fire on-site M.D.O.C. Contract Monitor Larry Lee, Warden Jody Bradley, Deputy Warden Of Security/Administration - Gabriel Walker, Deputy Warden Of Programs - Tonye Toomey, Lt. Gaston, and Sgt. Micheal Johnson, C.E.R.T. officer - King, and Registered Nurse - Robertson so as to at least show that M.D.O.C. and M.T.C. upper management are actually trying but they don't care because am just a prisoner and they are multi-million dollar operations.

(3) On July 4<sup>th</sup>, 2018, Captain-Justin Green and Lt. Gaston ordered officer Latoya Jackson not to serve me my Lunch nor Last Meal-Snack Bag. Officer L. Jackson had to call Shift Commander - Ms. Scott for permission to serve me my food after which Shift Commander - Ms. Scott overrode Captain J. Green and Lt. Gaston ordering that officer L. Jackson go ahead and serve my food to me. However, upon hearing officer L. Jackson calling Shift Commander - Ms. Scott, Captain-Justin Green and Lt. Gaston came back and openly disrespected plus threatened officer L. Jackson as well as wrote her up for insubordination. This entire situation played out in the presence of this entire pod. There is much camera footage proving this also. All this was done only in retaliation for doing her sworn duty to serve me my food plus the fact Shift Commander - Ms. Scott came on this to personally oversee my food being served to me and speak with officer L. Ja

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Cheson, Sgt. Trent or Trench, and Lt. Gaston about Captain Justin Green and Lt. Gaston unethical and cruel intent and actions towards me and officer Latoya Jackson. On July 9<sup>th</sup>, 2018, Captain Justin Green ordered that Lt. Gucho and officer B. Chester, not serve me lunch, due to me waving, yelling, and beating on the cell door for the American Correctional Association auditor's to come on this pod once I saw that Vice President of M.T.C. - Robyn Williams, Major Terry Daniels, Captain Justin Green, and Lt. Gucho were re-directing the auditor's from coming on this pod. Once I started trying to get their attention they turned around and came back to the pod door but all the above staff talked to them for about five (5) minutes outside the pod door than redirected them to only one pod out of all three than they came out and alot prisoners on this pod started calling them and waving and beating on the doors for them to come over yet again the above mentioned prevailed and so they left without opening this pod door neither even stepping foot on this pod. Well, when lunch trays were served my tray was placed on the lip of the tower slot and was being talked over throughout the three hours it sat there. Three hours later Captain Justin Green, Lt. Gucho, and officer B. Chester brought me the cold tray and Captain Justin Green, told me, "I am going to break you; We want have a repeat problem of you trying to tell on us before or during another audit." A little while later the prisoner above me began begging for Captain Justin Green and Lt. Gucho to come talk with him about a very serious institutional matter he had. They both ignored him so he busted the sprinkler to get some people down to the pod. Captain Justin Green and Lt. Gucho watched as this entire pod was flooded plus the pod next to us and the hallway. The cell am in along with the five (5) cells nearest to me on the bottom tier were soaked with me being in the worst situation because the water from his cell was pouring into this one. All my bedding, clothing, towels, and majority of my paperwork were soaked. I asked Captain Justin Green and Lt. Gucho for new bedding items and towels (these items caught the first and bulk of the discolored water and mold and mildew as it gushed through the hole in the floor above the rack) yet they refused to give me anything. I was left freezing in this cell for over 36 hours and unable to sleep. Another shift supervisor finally got me a sheet and blanket two (2) days later. I was given new towels and clothes by another shift supervisor six (6) days later on a Sunday. On July 11<sup>th</sup>, 2018, Captain Justin Green, Lt. Gucho, Sgt. Jacob Jones, and officer C. Hughey denied me my lunch and dinner trays plus sat them on top of the phone wall in front of this cell. On July 12<sup>th</sup>, 2018, Captain Justin Green, Lt. Gucho, Sgt. Jacob Jones, and officer C. Hughey denied me my dinner tray. (They all as well as officer B. Chester had denied me my lunch tray as well but officer <sup>Bailey</sup> came and gave it to me anyway, though once they didn't see it on the phone wall when they came at last meal officer Sierra Bailey was scolded about giving me my food and was ordered not to open the tray slot to serve me food or water or anything else neither was I allowed to leave the cell for anything because I was on punishment (per order's) of Captain J. Green, Lt. Gucho, and Sgt. Jacob Jones with the express consent of Deputy Warden Gabriel Walker and Major Terry Daniels. On July 13<sup>th</sup>, 2018 Captain J. Green, Lt. Gucho, Sgt. Jacob Jones, B. Chester, and C. Hughey deni

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ed me my lunch tray and dinner tray. My family called here later on that Friday demand ing an explanation of why I was being starved and to speak with my tormentors. They dem anded I be compensated in food and/or cash for all the days I was starved but the Warden(s) refused to do so. On July 16<sup>th</sup>, 2018 I was heavily saturated with the ("FOX") Chemical Aerosol Agent while in the cell due to my requesting to speak with an deputy warden about my abuse. I was heavily sprayed three or four times than left in the cell with the tray slot closed and denied all medical attention and care despite my pleas for 'decontamination' because I was blind for hours as my eyes were burning like they were cooking, choking for at least two days, burning all over my body, and sneezing and blowing my nose like crazy because the chemical agent was everywhere in the cell. Capt ain J. Green refused to even let me exit the cell for I.L.A.P. purposes neither call my family nor the Southern Poverty Law Center. At no time was I taken out of the cell for that week especially not that day to even allow the orderlies to come in and clean all the Chemical Agent off of the walls, door, floor, sink, etc., All of this was caught on the zone camera's and I have many witnesses. Due to the severity and frequency of Captain J. Green and his subordinate (clique) attempts to 'Break Me' by cruel and unusual punishment to cause me imminent and long-term physical and mental harm and to just Kill me than cover my death up as natural causes or suicide, I, Chaz Pinkston, file this issue under the Eighth Amendment, First Amendment, and Fourteenth Amendment. I have many witnesses and there is much camera footage of these tor ture tactics and Chemical Aerosol Agent Abuses of Excessive Force.

(4) My conditions of confinement in long-term "maximum-security" segregation he re are literally those of a fourth-world country. The American Correctional Association auditor's don't enforce any of the federal policies neither are they penalizing M.D.C. or M.T.C. administrator's for all these obvious constitutional violations and uninhabitable conditions. The Mississippi Department Of Health is doing nothing to protect the well-be ing of prisoners here especially in "maximum security". They haven't shutdown any of these pod's or units despite, all the thick black mold caking the air vents, advanced mildew lining the walls inside and outside every cell, unsanitary cell conditions, mold and heavy rust lining the insides of the toilets, weekly water discoloration, old 'spoiled' and rotten food being served out of the Kitchen in rationed amounts, zero grooming standards, and lead paint coating every inch of every wall outside and inside the facility specifically though in these cells. It is so bad that they paint with that stinking stuff while were in the cells and leave us to inhale the mess irregardless of how nausea's it makes us, how much it irritates and burns our eyes, and causes headaches. Commissioner - Pelicia Hall, Deputy Commissioner of Institutions - Jerry William s, Director of Private Prisons Contracts - Tony Compton, Active Director of Private Prisons - D. Banks, Deputy Administrator - Audrey McAfee, Director of Administrative Remedy Program - Richard Pennington, Director of Food Services - Roger Davis, and Contract Monitor - Larry Lee don't obey the Constitution, the American Correctional Association policies, and don't obey no r enforce their own formal policies. They all individually and collectively allow and advocate



for the contractor(s) to handle prisoners here as they wish and when it comes to legal action they assure them to help cover over all the illegal in-house/informal policies and rules that are governing every facet of the daily routine(s), with the written formal policies. The contractor Management and Training Corporation "only" job is to warehouse US Period. M.D.O.C. just paid Wilkinson County Correctional Facility facilitator's, ("M.T.C."), twenty three million - three hundred thousand plus (\$23,300,000.00) as well as the Mississippi Legislative just gave them an additional five million five hundred thousand, (\$5,500,000.00), all in fiscal year 2018 which started in July of 2018 til July of 2019. The additional money from the Legislative is specifically for roof repairs and other repairs for this facility but nothing is fixed. Every time it rains outside it rains in the pod's and in the cells. These administrator's tell us and our families that we're in prison and we have "no rights" so stop calling and complaining. This state ment was told to my mother and sister when they called and spoke with two of these admini strator's. Management and Training Corporation, M.T.C. Founder - Robert Marquardt, Vice President Robyn Williams, Warden - Jody Bradley, Deputy Warden of Administration/Security - Gabriel Walker, Deputy Warden of Programs - Tonya Toomey, Major - Terry Daniels, Captain - Justin Green, Unit Manag er - Ms. Brown, Lt. Gueho or Gueho, Case Worker - Ms. January, and Warehouse Manager - Ms. Dixon will fully, knowingly, feloniously all are subject to 18 U.S.C.A. § 242, which makes it a criminal offen se for one under color of any law, statute, ordinance, regulation, or custom to willfully subject any inhabitant of any state, territory, or district to the deprivation of any rights, privileges, or immunities sec ured or protected by the Federal Constitution or laws, or to different punishments, pains, or penalties, by reason of color or race, from those which are proscribed for the punishment of citizens. They benefit from prisoners degradation as well as personally cause it. The "stamp" on our First Amendment, Eighth Amendment, and Fourteenth Amendment rights and they throw away the Civil Rights Of Institutional ized Persons Act. They do these acts by: Denying us recreation and confining us to cells 24 hours a day - seven days a week, denying us religious services year round, training and ordering all staff to only close the tray slots after serving food but not to do anything else, allowing our trays to sit in the sal i-port for at least 30 minutes every meal and be served cold with staff refusing to re-heat them and/or take the trays back to be replaced, denying us a microwave on the zone, denying us library books, denying us family visitation monthly, denying us the right to get new clothing and to even get a clothing form to fill it out to get new clothing every six months, denying us "all" cell sanitation, denying us haircuts and shaves weekly and bi-weekly (they have only giving us haircut s twice this entire year), denying us legal and family correspondence, denying us social services, denying us proper staffing in "maximum security" (they keep the staff for maximum security low intentionally so as to refuse us services plus use an excuse in litigation that they don't have staffing), denying us timely-if any at all- legal library services by teaching staff that legal mu ilings, legal deadlines, legal calls all are privileges that can be taken as punishments or hindered due to "collective/group punishments" at staff discretion, denying us actual case wo rker services by not responding to casemanager request forms, refusing to make weekly rounds, refusing to hear or log in safety and health concerns, refusing to give us certain case papers that we're privy to, denying us legal calls by personally deactivating phone pin numbers.



to legal counselor(s), disregarding the following policies in totality; Use of Force, 16.23\* Use of Oleoresin Capsicum Aerosol Spray or Chemical Agents, 18.01 Disciplinary System, 19.01\* Offender Segregation, 20.01\* Inmate Access to Courts and Legal Counsel, 20.02\* Access to Legal Materials, 20.03\* Access to Programs and Services, 20.05\* Protection From Harm, 21.03\* Offender Property, 22.10\* Case Manager Duties and Responsibilities, 22.11\* Classification Monitoring and Audit Controls, 23.01\* Food Service Administration, 23.02\* Dietary Allowances: Menu Planning and Therapeutic Diets, 23.03\* Food Service Health and Safety Regulations, 23.04\* Food Service Inspections, 23.05\* Meal Service, 23.06\* Outside Food Contracts, 24.01\* Facility Sanitation, 24.02\* Personal Hygiene and Hair Care Services, 25-01-A\* Access to Health Care and Clinical Services-Sick Call, 25-10-E\* Segregated Inmates, 26.01\* Offender Social Services, 29.01\* Offender Academic and Vocational Education Programs, 29.05\* Tests of Adult Basic Education, 30.01\* Offender Recreation Program, 31.01\* Offender Mail Services, 31.02\* Offender Telephone Privileges, 31.03\* Offender Visitation, 32.01\* Offender Library Services, 33.01\* Religious Programs and Chaplaincy Services. These are the main policies that affect "maximum security" long-term segregation and are disregarded. Food Service Contractor-Trinity and their on-site Nutritional Supervisor-Ms. Dunmore with the turning of a blind eye M.D.C. Food Service Director-Roger Davis, are starving us plus serving old, spoiled, and rotten food. The M.D.C. Food Service Policies numbered #23.01 to #23.06 aren't being obeyed at all. Meal Service policy #23-05-01 on page 2 lines 42-43 says; "The dietician will ensure that the menu meets all requirements of the National Academy of Science allowances and a minimum average of 2900 calories (per day). We're being served less than 1,000 Kcalo per day. I was 190lbs. upon my arrival here January 24<sup>th</sup> 2018 and now am 175lbs. The only way to get relief and stop the abusive mistreatment, deprivations, denial of civil and applicable constitutional rights privileges immunities and guarantees is through the Court. I have written two letters to M.T.C. Founder-Robert Margarelt, two letters to the A.C. A. Executive Director-James A. Gandlee, one letter to the Mississippi Department Of Health, two letters to Management and Training Corporation, and multiple letters/reports, A.R.P. grievances and request forms to all the other defendants about these issues but have never received any responses. Jody Bradley and Terry Daniels did finally respond to one A.R.P. grievance in August and September. Jody Bradley put parental controls on the tv so we could watch only PG-14 and under movies and shows.

The small version of this is all the on-site administrator's enforce their own rules and micro-manage subordinates to compel compliance. All the off-site administrator's pretend to be unaware of all the dangerous 'deliberate indifferent' conditions. The American Correctional Association and Mississippi Department of Health keep giving passing grades to keep the accreditation current and the money pouring in so that everyone gets their cut. It is so sad that if one Court Monitor came in just this cell this case would be closed. Lt. Delando Miles (whom is also the Asst. Chief of Police of Woodville, MS) also is denying legal services, medical attention and care, cell sanitation, clothing forms and clothing every six months, and enforcing "collective/group punishment" along with all the aforementioned by refusing to have the broken tv replaced and etc. . . . . I have many witnesses to prove these claims and we' all beg for our day in Court.